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ACTION MEMORANDUM: Authorization to Initiate Remedial Investigation and Feasibility Study Activities at the Chemsol Site, Piscataway, New Jersey.

Richard L. Caspe, P.E., Director
Emergency and Remedial Response Division

Constantine Sidamon-Eristoff
Regional Administrator

PURPOSE

The purpose of this memorandum is to request authorization, to initiate remedial investigation and feasibility study (RI/FS) activities at the Chemsol Site, pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended, 42 U.S.C. §9601 et seq. The Environmental Protection Agency (EPA) has been designated the lead agency at this time for these activities. The activities will be conducted by Malcolm Pirnie, Inc. under an ARCS contract.

BACKGROUND

The Chemsol Site is an inactive razed site on a twelve acre tract of land at the end of Fleming Street, Piscataway, Middlesex County, New Jersey. Chemsol, Inc. operated a solvent recovery facility in the 1950's through approximately 1964. The facility was closed after a series of industrial accidents, explosions, and fires. The site is currently owned by Tang Realty Corporation (Tang Realty).

In 1984, the New Jersey Department of Environmental Protection (NJDEP) and Tang Realty entered into an Administrative Consent Order mandating that Tang Realty perform a site investigation to evaluate contamination at the site and develop a remedial action plan for the site. Although the Consent Order was entered into in 1984, Tang Realty has performed field investigations at the site since 1980.

Between 1980 and 1990, approximately 40 groundwater monitoring wells were installed on-site or downgradient from the site. Volatile organic compounds (VOCs), base neutral and acid extractable compounds (BNAs), and metals have been detected in the groundwater. Furthermore, sampling and analyses of the soils (performed between 1980 and 1987) revealed the presence of polychlorinated biphenyls (PCBs) and volatile organics.

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Residential sampling has been conducted by Tang Realty, NJDEP and the Township of Piscataway at private residential wells located downgradient of the site. The results of sampling performed in January 1990 indicate the presence of contaminants in residential wells including the following: tetrachloroethylene, trichloroethylene, 1,2-dichloroethylene, chlorobenzene, trichlorofluoromethane, and chloromethane.

In the summer of 1988, Tang Realty removed approximately 3,700 cubic yards of PCB-contaminated soils for off-site disposal. During the soil excavations for removal of PCB contaminated soils, several thousand small (less than 1 gallon) containers of unknown substances were discovered. Approximately 25% of these containers were intact. The intact containers were excavated, overpacked, and are currently stored in a trailer on-site.

On July 10, 1990, a removal assessment was performed at the site by EPA which focussed on the containers of unknown substances. The initial conclusions of the removal assessment indicate that the site is eligible for a removal action due to the presence of drums and containers holding hazardous materials. Materials inside the trailer have been identified as flammable and are leaking their contents. Furthermore, field testing of samples obtained from the trailer indicate the presence of chlorinated organic and non-chlorinated organic substances. It should be noted that the removal of the containers from the site will be addressed through a separate EPA removal action.

ENFORCEMENT

In 1984, after issuing a previous Administrative Order and an Amended Administrative Order, NJDEP entered into an Administrative Consent Order with Tang Realty for the performance of a site investigation. As indicated previously, field work was initiated by Tang Realty in 1980.

Based upon a review of Tang Realty's activities at the site, EPA and NJDEP have agreed to prohibit Tang Realty from continuing to perform site investigations, and to federally fund the remainder of the investigatory work. To date, Tang Realty has failed to complete field investigations to determine the nature and extent of contamination at the site. In addition, field activities have been poorly documented. Work has also been performed without prior authorization from the NJDEP (such as installation of well points, movement of wastes and the re-working of surface soils). EPA issued a Notice Letter to Tang Realty on September 4, 1990 indicating Tang Realty's potential liability for the work to be performed, but not providing an opportunity to perform the RI/FS.

Scope of Work

The planned activities include the conduct of an RI/FS to determine the nature and extent of the contamination at the Chemsol Site, to determine the need for remedial action, and to evaluate and select remedial alternatives, if appropriate. The cost estimate to complete the RI/FS is

Community relations activities will be conducted as part of this project to inform and receive input from public officials and the community. This will include preparing a community relations plan, holding public meetings, organizing press releases, speaking to concerned citizens, preparing fact sheets, and establishing a community relations repository.

RECOMMENDATION

I recommend approval of this request of _____ to initiate RI/FS activities at the Chemsol Site. Funding for this project is available in the Region's fourth quarter Advice of Allowance. If you approve please sign the attached Procurement Request form.

My staff and I are available to discuss the overall project and this recommendation at your convenience.

Attachment

bcc: Shaheer Alvi, PSB

Approve B/C5-E

Disapprove _____

Date SEP 1 2013

STATEMENT OF WORK

CHEMSOL, INC. (TANG REALTY) PISCATAWAY, NEW JERSEY

BACKGROUND

The Chemsol Site is an inactive razed site on a twelve acre tract of land at the end of Fleming Street, Piscataway, Middlesex County, New Jersey. Chemsol, Inc. operated a solvent recovery facility in the 1950's through approximately 1964. The facility was closed after a series of industrial accidents, explosions, and fires. The site is currently owned by Tang Realty Corporation (Tang Realty), and was placed on the National Priorities List (NPL) in September 1983.

In 1984, the New Jersey Department of Environmental Protection (NJDEP) and Tang Realty entered into an Administrative Consent Order mandating that Tang Realty perform a site investigation to evaluate contamination at the site and develop a remedial action plan for the site. Although the Consent Order was entered into in 1984, Tang Realty has performed field investigations at the site since 1980.

Between 1980 and 1990, approximately 40 groundwater monitoring wells were installed on-site or downgradient from the site. Volatile organic compounds (VOCs), base neutral and acid extractable compounds (BNAs), and metals have been detected in the groundwater. Furthermore, sampling and analyses of the soils (performed between 1980 and 1987) revealed the presence of polychlorinated biphenyls (PCBs) and volatile organics.

Several rounds of residential sampling have been conducted by Tang Realty, NJDEP and the Township of Piscataway at private residential wells located downgradient of the site. The results of sampling performed in January 1990 indicate the presence of contaminants in residential wells including the following: tetrachloroethylene, trichloroethylene, 1,2-dichloroethylene, chlorobenzene, trichlorofluoromethane, and chloromethane.

In the summer of 1988, Tang Realty removed approximately 3,700 cubic yards of PCB-contaminated soils for off-site disposal. During the soil excavations for removal of PCB contaminated soils, several thousand small (less than 1 gallon) containers of unknown substances were discovered. Approximately 25% of these containers were intact. The intact containers were excavated, overpacked, and are currently stored in a trailer on-site.

Materials inside the trailer have been identified as flammable and are leaking their contents. EPA plans to perform a removal action to address these unknown materials.

Purpose

Based upon a review of Tang Realty's activities at the site, EPA and NJDEP have agreed to prohibit Tang Realty from continuing to perform site investigations, and to federally fund the remainder of the investigatory work. A remedial investigation and feasibility study is required to determine the nature and extent of contamination and to develop and evaluate remedial alternatives.

Scope

The scope of this work assignment is for the development of a work plan for a remedial investigation and feasibility study. It shall consist of the following initial tasks which are to be performed in accordance with OSWER directive 9242.3-7 entitled "STANDARD RI/FS TASKS UNDER REM CONTRACTS" dated November 13, 1986, and attached hereto.

- Task 1. Project Planning
- Task 2. Community Relations

OSWER Directive 9242.3-7

STANDARD RI/FS TASKS UNDER
REM CONTRACTS

November 13, 1986

CMS 001 0547

Listed below are fifteen standard task definitions to be used for all Remedial Investigations and Feasibility Studies (RI/FS). As a general rule, any work conducted on an RI/FS should fall into the same task. The tasks are presented in generic terms to avoid differences in terminology among existing REM contracts.

Some specific comments applicable to all tasks are presented below:

- o All standard tasks or all work activities under each task need not be used for every RI/FS. Only those that are relevant to a given project should be used.
- o Tasks include both draft and final versions of deliverables unless otherwise noted.
- o For phased projects, it is proposed that all phases of a task be reported to and by EPA in the same task. Therefore, there will not be a differentiation between the same task for different phases (i.e., Field Investigation phase 1 and phase 2 will appear as one Field Investigation Task). The REM contractors will be expected to track costs and work separately so that if information on the different phases is required it can be provided on an exception basis.
- o If an RI/FS is divided into distinct operable units, each OU is to be monitored and reported on separately. Therefore, an RI/FS with several OU's may in fact have more than fifteen standard tasks.
- o Costs associated with project management and technical quality assurance are included in each task.
- o Costs associated with procuring subcontractors are charged to the task in which the subcontractor will perform work and not the Project Planning Task.
- o This list of standard tasks defines the minimum level of reporting to EPA. Some REM Contractors presently report progress in a more detailed fashion and may continue to do so as long as activities are associated with this list of standard tasks.

CMS 001 0548

TASK 1. PROJECT PLANNING

This task includes work efforts related to initiating a project after the Work Assignment is issued. The site surveys work may be conducted during project planning or may occur during the Field Investigation Task. It is not to occur in both. The project planning task is defined as complete when the work plan and supplemental plans are approved (in whole or in part). Typical activities included in this task are:

- Work Plan Memorandum
- Kick Off Meeting
- Site visit/meeting
- Easements/permits
- Site reconnaissance & limited sampling
- Site survey/topo map/review of existing aerial photos
- RI/FS brainstorming session
- Collect & evaluate existing data
- Preliminary remedial alternatives identification
- Preliminary risk assessment
- Expedited response alternatives screening
- Applicable, Relevant, and Appropriate Regulations determination
- RI scoping
- Preparation of plans (work plan, health & safety, sampling & analysis plan--includes QAPP elements and DQO process)
- Task management and quality control

TASK 2. COMMUNITY RELATIONS

This task incorporates all work efforts related to the preparation and implementation of the community relations plan for the site. It includes time expended by both technical and community relations personnel. It will end when community relations work under Task 12 is completed. This task does not include work on the Responsiveness Summary (Task 12). Typical activities included in this task are:

- Community relations plan
- Fact sheets
- Public meeting support
- Technical support for community relations
- Community relations implementation
- Task management and quality control

TASK 3. FIELD INVESTIGATION

This task is used to report all efforts related to field work in implementing the RI. Includes the procurement of subcontractors related to field efforts. The task begins when any element authorizing field work, as outlined in the

work plan, is approved (in whole or in part). Field investigation is defined as complete when the contractor and all subcontractors are demobilized from the field. Typical activities included in this task are:

- Mobilization
- Media sampling
- Source testing
- Geology/hydrogeological investigations
- Geophysics
- Site survey/topo mapping (if not performed in Project Planning Task)
- Field screening/analyses
- Procurement of subs
- RI waste disposal
- Task management and quality control

TASK 4. SAMPLE ANALYSIS/VALIDATION

This task includes efforts relating to samples after they leave the field. Separate monitoring of close support laboratories may be required. The task begins the date the first set of samples is sent to the laboratory for analysis. Any costs associated with laboratory procurement efforts are also included in this task. The task ends on the date that data validation is complete. Typical activities included in this task are:

- Sample management
- Non-CLP analyses
- Mobile laboratories
- Data validation
- Physical parameter testing
- Task management and quality control

TASK 5. DATA EVALUATION

This task includes efforts related to the analysis of data once it has been verified that the data are of acceptable accuracy and precision. The task begins on the date the first set of validated data are received by the contractor project team and ends during preparation of the RI report when it is deemed that no additional data is required.

- Data evaluation
- Data reduction and tabulation
- Environmental fate and transport modeling/evaluation
- Task management and quality control

TASK 6. ASSESSMENT OF RISKS

This task includes work efforts related to conducting assessments of risk to human health and the environment.

CMS 001 0550

This will include both work under the RI to assess the no-action threshold decision as well as the FS where comparative risks may be evaluated among alternatives. Work will begin during the Data Evaluation and end during the Remedial Alternatives Evaluation Tasks.

- Environmental assessment
- Endangerment assessment
- Modeling specific risk assessment
- Task management and quality control

TASK 7. TREATABILITY STUDY/PILOT TESTING

This task includes any efforts related to the conduct of pilot, bench scale and treatability studies as well as associated task management and quality control. Reauthorization of CERCLA contains provisions which will affect and likely increase the level of effort associated with this task. Typical activities may include:

- Test facility and equipment procurement
- Vendor procurement
- Equipment operation and testing
- Sample analysis and validation
- Report preparation
- Task Management and Quality Control

TASK 8. REMEDIAL INVESTIGATION REPORTS

This task is intended to cover all work efforts related to the preparation of the findings once the data has been evaluated under Tasks 5 and 6. The task covers all draft and final RI reports as well as task management and quality control. The task ends when the last RI document is submitted by the contractor to EPA. Typical activities may include:

- Formatting of tables/data presentation
- Writing of the report
- Graphics associated with the report
- Contractor review and QC efforts
- Printing and distribution of report
- Review meetings
- Report revisions based on Agency comments
- Task Management and Quality Control

TASK 9. REMEDIAL ALTERNATIVES SCREENING

This task includes the efforts to select the alternatives to undergo full evaluation. The task starts during data evaluation when sufficient data is available to begin the screening process. For reporting purposes, the task is defined as complete when a final set of alternatives is

CMS 001 0551

chosen for detailed evaluation. Typical activities may include:

- Listing of all potential alternatives
- Evaluation of each based on screening criteria
- Review and QC of work effort
- Report or technical memorandum preparation
- Task Management and Quality Control

TASK 10. REMEDIAL ALTERNATIVES EVALUATION

This task applies to the detailed analysis and comparison of alternatives. The task ends with the start of the preparation of the FS report. Typical activities may include:

- Technical evaluation of each alternative
- Public health evaluation of each alternative
- Environmental evaluation of each alternative
- Institutional evaluation of each alternative
- Cost evaluation of each alternative
- Comparison of alternatives
- Review of QC efforts
- Review meetings
- Task Management and Quality Control

TASK 11. FEASIBILITY STUDY/RI/FS REPORTS

Similar to the RI Reports Task, this task is used to report all FS deliverables. However, this task should be used in lieu of the RI Reports Task to report all costs and schedules for combined RI/FS deliverables. The task ends when the FS (or RI/FS) is released to the public. Typical activities may include:

- Formatting of tables/data presentation
- Graphics associated with the report
- Writing of the report
- Printing and distribution of the report
- Review meetings
- Report revisions based on Agency comments
- Task Management and Quality Control

TASK 12. POST RI/FS SUPPORT

This task includes efforts to prepare the Responsiveness Summary, support the ROD, conduct any pre-design activities, and closeout the work assignment. All activities occurring after the release of the FS to the public should be reported under this task. Typical activities may include:

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- Predesign report
- Attendance at public meetings
- Write/review responsiveness summary
- Support ROD preparation/briefings
- Prepare FS addendum
- Review and QC of work effort
- Task Management

TASK 13. ENFORCEMENT SUPPORT

This task includes efforts during the RI/FS associated with enforcement aspects of the project which support negotiations for RD/RA. Activities vary but may include:

- Review of PRP documents
- Attendance at negotiation meetings
- Preparation of briefing materials
- Assistance in preparation of EDD
- Task Management and Quality Control

TASK 14. MISCELLANEOUS SUPPORT

This task is to report on work associated with the project but outside of the normal RI/FS scope of work. Activities will vary but may include such items as:

- Specific support to and/or review of ATSDR activities
- Special efforts related to public health assessments
- Support to and/or review of special state or local projects

TASK 15. ERA PLANNING

This task is to be used specifically for planning expedited response actions. Activities will fall into three major categories:

- Engineering evaluation & cost analyses (EECA)
- Support preparation of action memos
- Preparation of ERA plans and specifications

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